

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2019-305- C

IN RE:)	
Petition of MCImetro Access Transmission Services)	
Corp. d/b/a Verizon Access Transmission Services)	AMENDED PETITION
for Review of SOMOS' Denial of Application for)	
Numbering Resources)	
)	

MCImetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services (Verizon Access), pursuant to S.C. Code Ann. §58-3-140 (2015), and in accordance with 10 S.C. Code Ann. Regs. 103-825 and 103-828 (2012), hereby submits its Amended Petition requesting that the Commission review the Pooling Administrator's denial of Verizon Access' application for one contiguous thousand block of telephone numbers (Thousand Block) in the Florence, South Carolina rate center, overturn that decision, and order that one contiguous Thousand Block be assigned to Verizon Access. In support of its Amended Petition, Verizon Access would respectfully show, and request relief from the Commission, as follows:

1. Verizon Access is a competitive local exchange carrier that provides local exchange service and exchange access service in South Carolina pursuant to a certificate issued by this Commission.

2. Verizon Access' customers include large businesses and government agencies that use direct inward dialing (DID) arrangements to obtain telephone service for their employees at one or more locations.

3. A business customer is converting its phone system to Cisco VOIP and adding DID capability for patient rooms. The customer has selected Verizon Access as its service

provider and requested that Verizon Access provide service using a block of 200 consecutive numbers in the 843 NPA in the Florence, South Carolina rate center. Using consecutive numbers facilitates the installation and management of DID arrangements. The customer has stated that it will experience an adverse operational impact on the implementation of its desired dial plan if its request is not granted. A copy of the customer's letter explaining the circumstances is attached as Exhibit 1.

4. Because Verizon Access does not have 200 consecutive DID numbers in its inventory, it applied on September 6, 2019 to the Pooling Administrator, SOMOS, for a Thousand Block in the Florence, South Carolina rate center. Verizon Access' application and MTE calculation is attached as Exhibit 2.

5. SOMOS denied Verizon Access' request the same day it was submitted because Verizon Access did not meet either of the FCC criteria that SOMOS applies -- number utilization or months-to-exhaust. SOMOS' denial is attached as Exhibit 3.

6. The FCC has delegated authority to the Commission to address SOMOS' denial of a request for numbering resources, stating that "[w]e agree . . . that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources."¹ Moreover, the FCC has determined that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Specifically, states "may grant requests for customers

¹ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, 17 FCC Rcd 146 ¶ 61(2001).

seeking contiguous blocks of numbers.”² Based on this authority, the Commission has issued previous orders addressing denials by the Pooling Administrator.³

7. Verizon Access’ request for a Thousand Block to meet its customer’s request for 200 contiguous numbers fits squarely within the framework established by the FCC for “safety valve” requests that the Commission is authorized to grant. Verizon Access respectfully requests that the Commission direct SOMOS to assign a Thousand Block for the Florence, South Carolina rate center so that it can satisfy its customer’s request.

WHEREFORE, having fully set forth its Amended Petition, Verizon Access respectfully requests that the Commission (1) review SOMOS’ decision to deny Verizon Access’ request for additional numbering resources, (2) overturn that decision, (3) direct SOMOS to assign Verizon Access a Thousand Block in the Florence, South Carolina rate center, and (4) grant Verizon Access such other and further relief as may be just and proper.

Respectfully Submitted,

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 This 26th day of September, 2019

² Id. ¶ 64.

³ See, e.g., *Petition of MCI Metro Access Transmission Services, LLC d/b/a Verizon Access*, Order Reversing NANPA Decision, Docket No. 2014-38-C, Order No. 2014-169 (2014).